

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CMG HOLDINGS GROUP, INC., as successor to	:
XA THE EXPERIENTIAL AGENCY, INC.,	:
	:
Plaintiff,	:
	:
vs.	:
	:
JOSEPH WAGNER, HUDSON GRAY LLC,	:
DARREN ANDERECK, JESSIE LOMMA,	:
MICHAEL DAY, JEAN WILSON, ESTELLE	:
PIZZO, STUDIO AG, LLC, REMIGIO GUDIN,	:
and MIXED COMPANY, INC.,	:
	:
Defendants.	:
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JOSEPH WAGNER, JEFFREY SMITH, DARREN	:
ANDERECK, and JESSIE LOMMA,	:
	:
Third-Party Plaintiffs,	:
	:
vs.	:
	:
GLENN LAKEN and ALEXIS LAKEN,	:
	:
Third-Party Defendants.	:
-----	X

Civil Action No.: 15-cv-05814-JPO

**DECLARATION OF JEAN WILSON  
IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS PLAINTIFF'S  
SECOND AMENDED COMPLAINT**

**JEAN WILSON**, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury that the following is true and correct:

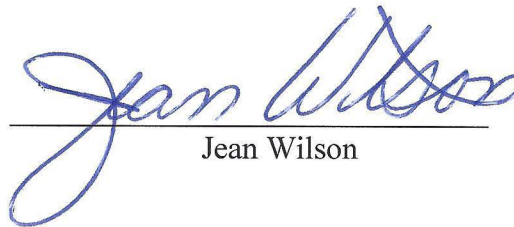
1. I am a defendant herein and am the Chief Operating Officer of defendant HudsonGray, Inc. I am fully familiar with the facts and circumstances set forth below.
2. I submit this Declaration in support of Defendants' motion to dismiss the Second Amended Complaint, pursuant to Federal Rule of Civil Procedure 12(b)(6).

**No Agreement With XA**

3. While I was employed with XA, I never signed any employment handbook that contained a non-solicitation provision, or entered into any written employment or non-solicitation agreement.

**WHEREFORE**, I respectfully request that this Court grant Defendants' motion to dismiss the Second Amended Complaint.

Executed on September 13, 2015.



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Jean Wilson